



WA 3019
3/11/2015
4A

STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

Northwest Regional Office • 3190 160th Ave SE • Bellevue, WA 98008-5452 • 425-649-7000
711 for Washington Relay Service • Persons with a speech disability can call 877-833-6341

March 11, 2015

Mr. Jamie Hillery
McFarland Cascade
Stella-Jones
6520 188th St NE
Arlington, WA 98223

**Re: Dangerous Waste Compliance Inspection on January 21, 2015 at McFarland Cascade,
aka Stella-Jones, RCRA Site ID: WAD053823019**

Dear Mr. Hillery:

Ecology's Hazardous Waste and Toxics Reduction Program recently conducted a Dangerous Waste compliance inspection at your facility. The Dangerous Waste Regulations¹ establish a safe and responsible system to manage dangerous waste. I have listed the violations at Modumetal Inc in the enclosed Notice to Comply. You must complete the actions needed to correct these violations and return the enclosed completed **Compliance Certificate** within 30 days of receipt of this letter to the address above.

Failure to comply with these requirements within 30 days could result in an administrative order and a penalty of up to \$10,000 per day for each violation.

If you have any questions or need clarification of the information in this inspection report, please contact me at (360) 594-6411 or minc461@ecy.wa.gov.

Sincerely,

Mindy Collins, Compliance Inspector
Hazardous Waste and Toxics Reduction Program

By email: jhillery@stella-jones.com

FILE COPY

¹ Authority: WAC 173-303 and RCW 70.105.080

USEPA RCRA



3019149

RCRA Site ID: WAD053823019	Facility Name: McFarland Cascade/Stella-Jones	Inspection Date: January 20, 2015
Generator Status: LQG	Facility Address: 6520 188th St NE, Arlington WA 98223	Date Report Sent: March 11, 2015

NOTICE TO COMPLY

Site Contact Name and Title: Jamie Hillery	Inspector Name: Trudy Harding
Site Phone Number: (360) 403-8002	Inspector Phone Number: (360) 594-6411
Site Contact Email Address: jhillery@stella-jones.com	Inspector Email Address: minc461@ecy.wa.gov
Site Website: www.stella-jones.com	Back-up Inspector Name: Mindy Collins

Notes:

1. A re-inspection can occur at any time to verify the correction of the violations listed below.
2. Ecology may take formal enforcement action even if the violations are corrected.

WAC 173-303-	Summary of Violations Including Observations	Actions Needed
675(2)(b)	<p>Drip pads at the north end of retorts 2 and 3 were upgraded to steel pads in 2014. Written plans were not submitted to Ecology prior to this work being done.</p> <p>WAC 173-303-675(2)(b): The owner or operator must develop a written plan for upgrading, repairing, and modifying the drip pad to meet the requirements of subsection (4) (b) of this section, and submit the plan to the department no later than two years before the date that all repairs, upgrades, and modifications are complete.</p>	<p>Submit written plan for upgrading, repairing, and modifying the drip pad to meet the requirements of subsection (4) (b) of this section, and submit the plan to the department no later than two years before the date that all repairs, upgrades, and modifications are complete.</p> <p>(Documentation sent-no further action required.)</p>
675(2)(c)	<p>WAC 173-303-675(2)(c): Upon completion of all upgrades, repairs, and modifications, the owner or operator must submit to the department, the as-built drawings for the drip pad together with a certification by an independent qualified registered professional engineer attesting that the drip pad conforms to the drawings.</p>	<p>Submit a copy of your as-builts and engineering certification for the work that was completed in 2014. Remember to submit plans prior to any upgrades in the future (i.e., if you decide to close Retort 1, or complete any upgrades to that portion of the plant).</p> <p>(Documentation sent-no further action required.)</p>
675(4)(i)	<p>The date but not time of each drip pad cleaning was documented on the operating log. Cleaning procedures were not described on logs.</p>	<p>Add "time" to your inspection log, and the word "Describe" to the column where cleaning is documented. Complete these fields each time the drip pad is cleaned.</p>

RCRA Site ID: WAD053823019	Facility Name: McFarland Cascade/Stella-Jones	Inspection Date: January 20, 2015
Generator Status: LQG	Facility Address: 6520 188th St NE, Arlington WA 98223	Date Report Sent: March 11, 2015

WAC 173-303-	Summary of Violations Including Observations	Actions Needed
	WAC 173-303-675(4)(i): The owner or operator must document the date and time of each cleaning and the cleaning procedure used in the facility's operating log.	
675(4)(j)	<p>The facility does not utilize a boot wash to clean boots worn by operators working in the retort area or on the drip pad. Boots could be tracking hazardous materials from the drip pad to the control room located in the attached building, or elsewhere around the site.</p> <p>WAC 173-303-675(4)(j) Drip pads must be operated and maintained in a manner to minimize tracking of hazardous waste or hazardous waste constituents off the drip pad as a result of activities by personnel or equipment.</p>	Purchase or design a boot wash that can be placed at exit points from contaminated surfaces or walk ways.
200(1)(b)	<p>Inspections of the hazardous waste accumulation areas were not always being conducted within seven days.</p> <p>WAC 173-303-200(1)(b) and by reference 630(6): Dangerous waste accumulation areas were not inspected weekly.</p>	Inspect areas where containers of dangerous waste are stored at least weekly. Submit a copy of three weeks of the completed inspection log when you return the enclosed Compliance Certificate.
515(6)(a)(i)	<p>An open pan of used oil was found on top of a drum containing used oil filters (Photos 18 and 23).</p> <p>WAC 173-303-515(6)(a)(i): Containers of used oil must be kept closed except to add or remove used oil.</p>	Transfer used oil immediately into used oil collection drums. Close drum when not in use. Close tanks when filters have ceased dripping, or at the end of each day.
515(6)	<p>A pan of used oil found on top of a drum containing used oil filters lacked a "used oil" label (Photos 18 and 23).</p> <p>WAC 173-303-515(6) and by reference 40 CFR Part 279.22(c)(1): Containers and aboveground tanks used to store used oil at generator facilities must be labeled or marked clearly with the words "Used Oil."</p>	Label all used oil collection containers with the words "Used Oil." Photograph the properly labeled container(s) and include the photo when you return the enclosed Compliance Certificate.

RCRA Site ID: WAD053823019	Facility Name: McFarland Cascade/Stella-Jones	Inspection Date: January 20, 2015
Generator Status: LQG	Facility Address: 6520 188th St NE, Arlington WA 98223	Date Report Sent: March 11, 2015

WAC 173-303-	Summary of Violations Including Observations	Actions Needed
170(2)	<p>Satellite accumulation limits in the can crushing area were exceeded by a combination of liquid hazardous waste in the 55-gallon drum under the can crusher plus aerosol cans waiting crushing (Photo 22).</p> <p>WAC 173-303-170(2) and by reference 200(2)(b): Waste in satellite accumulation areas must be marked with the date and moved to the final accumulation area when 55 gallons of DW or 1 quart of AHW is accumulated.</p>	<p>Modify operating procedures to limit the amount of waste in the can crushing area. Limit volumes of containers or change procedures to limit possible volumes in this area. When waste accumulations meet the 55-gallon limit, date the container(s) and move them to the hazardous waste 90-day accumulation area.</p>
573(11)	<p>Universal waste batteries in a 5-gallon pail were dated 8/1/13. Universal waste lamps in the 90-day accumulation area were contained in a sealed box, dated 12/4/13. (Photos 13, 15 & 16).</p> <p>WAC 173-303-573(11): Universal wastes may only be accumulated for up to one year, except as noted in 173-303-573(11)(b). Documentation must exist to demonstrate that the time limits have been met.</p>	<p>Properly transport universal waste to another universal waste handler or a universal waste destination facility. When you return the enclosed Compliance Certificate, show that accumulation time limits have been met, using one of the methods described in WAC 173-303-573(11)(c).</p> <p>(Documentation sent-no further action required.)</p>

RCRA Site ID: WAD053823019	Facility Name: McFarland Cascade/Stella-Jones	Inspection Date: January 20, 2015
Generator Status: LQG	Facility Address: 6520 188th St NE, Arlington WA 98223	Date Report Sent: March 11, 2015

Concerns and Suggestions

Red Can in Laboratory

Empty the red step-can containing used rags and wood cores into the appropriate satellite accumulation drum daily, or at the end of each shift (photo 17). It is recommended that this can have a label describing the major risk associated with the waste.

Satellite Accumulation Rules

The aerosol can crushing set-up near the oil shed needs modification to meet regulations. At the time of our visit, the 55-gallon drum used to catch dangerous liquid waste from can crushing was nearly full. Adjacent to the can crusher was a bucket filled with empty cans (see Photo 22) and a 55-gallon yellow tote containing cans wait crushing. Satellite accumulation areas are limited to 55 gallons of waste. Consider modifying your operation by limiting the volume of cans waiting crushing and the liquid waste receptacle to 20 gallons each, or 20 and 30 gallons, to keep the total volume of waste below 55 gallons. Another possible solution could be to crush cans as soon as they are brought to the can crushing area.

The Dangerous Waste Regulations define a satellite accumulation area as a location at or near any point of generation where dangerous waste is initially accumulated in containers during routine operations, prior to consolidation at a designated 90 or 180-day accumulation area.

- The satellite accumulation area must be under the control of the operator of the process generating the waste or secured at all times to prevent improper additions of wastes into the satellite containers.
- Satellite containers must be labeled as either "Dangerous Waste" or as "Hazardous Waste and with the major risk.
- Satellite containers must be kept closed, except when it is necessary to add or remove waste.
- Each satellite accumulation area is limited by volume, up to either 55 gallons of dangerous waste per area or one quart of acutely dangerous waste per area.
- Once the volume threshold limit has been reached in a satellite accumulation area, the container(s) must be marked immediately using that date as the accumulation start date. Satellite accumulation areas are the only accumulation areas where waste containers do not require an accumulation start date when the first drop of waste is placed in the container and are instead dated when the volume threshold is met.
- Within three calendar days from the time the volume threshold has been exceeded in a satellite accumulation area, the container(s) must be either transported off site to a designated facility or moved to a 90 or 180-day accumulation area on site. The three day time period applies only to moving the waste out of a satellite accumulation area. It does not apply to other management requirements such as placing the accumulation start date on the container.

Please refer to Ecology's publication, Satellite Accumulation Technical Information Memorandum for more information: www.ecy.wa.gov/biblio/94120.html

RCRA Site ID: WAD053823019	Facility Name: McFarland Cascade/Stella-Jones	Inspection Date: January 20, 2015
Generator Status: LQG	Facility Address: 6520 188th St NE, Arlington WA 98223	Date Report Sent: March 11, 2015

Universal Waste Rules

The following information is included as a reminder of Universal Waste Rules.

Universal wastes are certain dangerous wastes that may be managed appropriately under less stringent regulatory requirements when recycled. The Universal Waste Lamps rule includes fluorescent lamps, compact fluorescent, mercury vapor, metal halide, high pressure sodium, and neon lamps, among others. The benefits of managing the lamps as universal waste include no counting, no manifesting, no reporting on annual reports, and a 12-month accumulation time.

To manage your used lamps as Universal Waste:

- Store them in a closed container so that they will not be broken.
- Label their container with the words "Universal Waste-Lamps," or "Waste Lamps," or "Used Lamps."
- Include the start date when the first item was placed in the container to ensure recycling takes place within the 12-month accumulation time limit.

Lamps broken incidentally inside of the universal waste container are Universal Waste. Otherwise, store broken lamps separately as hazardous waste and report them on the dangerous waste annual report.

Post Inspection

On February 6, 2015 Mr. Hillery submitted the following documents in response to my email dated February 5, 2015:

- Training: Documents submitted were: (1) a training matrix showing training topics and personnel titles required to take specific training modules, (2) an example sign-in sheet showing printed names, signatures, and departmental titles, and (3) a written training program that is incorporated within a document detailing hazardous waste management activities at Stella-Jones.
- A copy of the current General Inspection Log in use at Stella-Jones. A review of the log shows it does not adequately describe items that are to be inspected for the whole of the facility with the exception of the 90-day storage area. For example under the heading of "Other Areas" which are specifically called out, what will be checked during the facility wide inspection? Also, please make sure that both the printed name and signature appear on the checklist template. A general inspection form can be found [here](http://app.leg.wa.gov/WAC/default.aspx?cite=173-303-320). You can read the full text of 173-303-320, General Inspection, online at: <http://app.leg.wa.gov/WAC/default.aspx?cite=173-303-320>.
- Drip Pad Management Plan: This required document was recently updated on January 9, 2015. It appears to have all the required elements. However, I would suggest the review page ii be revised as it appears a Selkirk Forest Products template was used to create the Stella Jones plan. Contained within this Plan document are the designs for each of the two drip pads and the concrete structure surrounding the drip pads. Additionally the Drip Pad Certifications for Cylinders 2 and 3 signed by Pete Shack, Professional Engineer at Phoenix Environmental are included in this document.

RCRA Site ID: WAD053823019	Facility Name: McFarland Cascade/Stella-Jones	Inspection Date: January 20, 2015
Generator Status: LQG	Facility Address: 6520 188th St NE, Arlington WA 98223	Date Report Sent: March 11, 2015

COMPLIANCE CERTIFICATE

Instructions:

- Complete this page **within 30 days of the receipt of the letter.**
Note: You may request an extension before this Compliance Certificate is due. You must make this request in writing and include the reason for the extension and propose a new date of completion.
- Send this page with any supporting documentation such as photos, copies of manifests/disposal records or receipts, and if applicable, your request for extension, to:

Mindy Collins
 Department of Ecology
 1440 – 10th Street, Suite 102
 Bellingham, WA 98225

Summary of Hazardous Waste Violation Compliance Action				
Violation Code	Photo	Paperwork	Statement	Notes
675(2)(b)		X		Documentation received.
675(2)(c)		X		As-builts are contained within the Drip Pad Management Plan which was sent on February 6, 2015.
675(4)(i)				
675(4)(j)				
200(1)(b)				
515(6)(a)(i)				
170(2)				
515(6)				
573(11)		X		Manifest emailed on February 16, 2015

- I certify that the violations noted on the Notice to Comply page have been corrected.
- I personally examined any attached documentation submitted as proof of compliance and I believe the information to be true, accurate, and complete.
- I am aware:
 - There are significant penalties for submitting false information and/or for non-compliance with regulations.
 - My signature **certifies compliance** with every regulation noted on the Notice to Comply page.
- I declare under penalty of perjury the foregoing certification is true and correct.

Signature	Printed name
Position/title	Date

RCRA Site ID: WAD053823019	Facility Name: McFarland Cascade/Stella-Jones	Inspection Date: January 20, 2015
Generator Status: LQG	Facility Address: 6520 188th St NE, Arlington WA 98223	Date Report Sent: March 11, 2015

Inspection Report

Facility Description

The Department of Ecology Hazardous Waste compliance unit (Ecology) last conducted an inspection of the Arlington Stella-Jones facility on February 6, 2007.

Stella-Jones, Arlington, is located at 6520 188th Street NE, Arlington, Washington. The facility occupies a 45-acre property owned by JH Baxter. Stella-Jones purchased the JH Baxter business in 2007, and recently (2012) purchased McFarland-Cascade. The name, "McFarland-Cascade" has been retained due to name recognition. Annual hazardous waste reports are filed as "Stella-Jones Corporation."

Stella-Jones, Arlington, treats Douglas Fir poles with oil-borne preservatives (6% pentachlorophenol) in two 140-foot pressure retorts. They also have the ability to thermally butt-treat poles (typically Western Red Cedar) with copper naphthenate, though this treatment is not currently being conducted due to low customer demand. The equipment for butt-treatment has been retained for future use, should market conditions change.

The 45-acre property is largely unpaved. Untreated poles can be delivered by truck or rail where they are unloaded, debarked and stacked on skids. They are then moved to a framing area, where they are prepared for treatment to meet customer specifications (dimensional cuts, holes, incising, radial drilling, and so on). The poles are air-dried to necessary moisture content outside, versus drying in an oven. Poles are then loaded onto trams and pressure treated with pentachlorophenol oil in one of two retorts. The treated poles are retained on steel drip pads until they have ceased dripping, at which time they are moved out by machine forks into the unpaved yard and stacked for inspection prior to shipment by truck or rail.

All water used on-site for the treatment process is collected, treated and recycled within the process. All stormwater is collected and treated prior to discharge per their Industrial Stormwater permit. Jeanne Tran, Ecology Water Quality, is the industrial stormwater inspector/engineer for this site. Filters and sludge from the water reclamation process are collected and managed as hazardous K001 waste.

Facility Inspection

Trudy Harding and I, Mindy Collins, of Ecology arrived on site at 11:00 a.m. and made contact with the plant manager, Jamie Hillery.

Discussion

Time was spent in an upstairs conference room in the office building, discussing expectations for the site inspection, and familiarizing Ecology with current operations at the facility I have summarized above. We discussed the site's history of sales and name change as well.

RCRA Site ID: WAD053823019	Facility Name: McFarland Cascade/Stella-Jones	Inspection Date: January 20, 2015
Generator Status: LQG	Facility Address: 6520 188th St NE, Arlington WA 98223	Date Report Sent: March 11, 2015

An aerial photo was used to describe the layout of the facility. Mr. Hillery stated during this discussion that they were no longer butt-treating logs using copper naphthenate, and the retort for this process was not being used (though could be in the future). He also stated that they had tried kiln drying poles but had discontinued this practice. The following explanation of the current process was provided:

Untreated logs are held in the southern portion of the property, and treated logs toward the north end. The property is unpaved and poles are stored in stacks on skids. Logs range in length from 60–140 feet. Green wood is peeled and cleaned at the southern end of the property, where it remains for up to one year to “age.” Aged wood is framed by employees dedicated to that area of the operation. Framing is a process of preparing the wood to meet customer specifications, and includes things like radial drilling, incising, thru-bore drilling. The prepared poles are loaded onto trams, and moved into the south end of the retorts. Some wood remains in the retorts for 24 hours yet other wood can take three days to process within the retort. Once processing is complete, the trams are moved out of the retorts at the north end, and onto steel drip pads where treated poles remain until they have ceased to drip. Treated poles are then moved out into the northern portion of the yard. Core samples are taken from all treated poles and tested in their on-site laboratory (building located east of retorts 2 and 3). If samples show that the poles do not meet specifications they are returned to the yard and re-processed.

Mr. Hillery briefly described the stormwater collection and treatment system, and process water filtration and re-use. A walk-through inspection was conducted following this discussion.

Walk-Through

We began our walk-through inspection at the north end of the property (office) and moved south toward the retorts and drip pads, and then west to the 90-day accumulation area (wash shed) and laboratory, and again northwest to the maintenance shop and oil shed/can crushing area. The north end of the property had numerous stacks of penta treated poles, and a few stacks of poles that had been treated with copper naphthenate. Mr. Hillery stated that poles remained in this area until they could be inspected, and core sampling and testing in the on-site lab confirmed that they had been treated up to specifications. All poles in this area appeared to be dry and there were no signs of drippage onto the ground surface beneath the poles.

Walk-through of the retort area included visual inspection of the new steel drip pad surfaces for retorts 2 and 3 (Photos 1 & 2). Plans for upgrades were not submitted to this department prior to work being done. This is noted as a violation above (WAC 173-303-675(2)(b)). No treated logs were on the eastern most drip pad (retort 2), but a charge was on the retort 3 drip pad at the time of our inspection. Mr. Hillery stated that the drip pads had been refurbished in 2014. Mr. Hillery mentioned that the old pads were the same shape as the new ones, but concrete. Tracks were pulled up and replaced. The inspection ports located at the north end of each pad were sealed with steel during the renovation. All drips from treated poles run into collection pans located at the north end of each retort (Photo 6). Mr. Hillery said that debris on the pads is swept up and collected in a satellite drum located near retort 2. We observed this drum at the north end of the building's catwalk. This drum is under the roof of the building with secondary containment provided by the cement containment which surrounds all tanks within the building. The 55-gallon metal drum was properly

RCRA Site ID: WAD053823019	Facility Name: McFarland Cascade/Stella-Jones	Inspection Date: January 20, 2015
Generator Status: LQG	Facility Address: 6520 188th St NE, Arlington WA 98223	Date Report Sent: March 11, 2015

labeled as hazardous F032, D001 waste and bore flammable, toxic, and corrosive risk labels (Photos 3, 4, 5). This drum is moved to the 90-day accumulation area when full. Drip pads are rinsed using a garden hose following removal of debris. Process water from washing, plus drips from the pad, collects in the retort pans and is sent through oil/water separators and carbon filtration (water) or filter presses (oil) prior to re-use. Mr. Hillery stated that the facility does not utilize a boot wash to clean boots worn by operators working in the retort area or on the drip pad. I expressed to him that boots could be tracking hazardous materials from the drip pad to the control room located in the attached building, or elsewhere around the site. He said he was researching boot wash options when we arrived for our inspection that day.

Following inspection of the satellite accumulation area adjacent to retorts 2 and 3, we walked along the catwalk within the building and toward the control room. Several tanks of product are found within the building's cement secondary containment (Photos 7 & 8). We observed water on the floor of this area, and were told this water was from recent installation of a safety shower. We were told that the shower had been equipped with an alarm that would sound if the shower was used. Two oil/water separators are located within the product tank area (Photo 9). All tanks appeared to be properly labeled and in good condition.

At this point we were joined by Mr. Mike Brisben, Lead Engineer. We entered the control room, also within the same building. Mr. Brisben showed us the "Daily Incidental Drip Inspection Log-Drip Pad/Apron Area" that employees complete when charges are removed from drip pads and the areas are cleaned and inspected. This sheet is dated but there is no space to note time. He showed us a "Retort Drillage Ceased Log" as well. This log notes charge number, date, time out, total drip time and operator. He explained that the signature from the daily incidental drip log could be compared to the retort drillage log to see the time cleaning occurred as names would match up on the two sheets. He explained that cleaning is always performed right after treated logs have been removed from the drip pad. He then showed us an inspection log used to track waste generation.

Mr. Brisben also told us that all spill supplies and used safety clothing, such as tyvek suits, are placed in the hazardous waste satellite drum when disposed of.

We left the retorts/processing area and walked northeast to the "Wash Room," where products and waste are stored. The wash bay area (3-sided with concrete floor) has one approximately 18 x 36 inch dead-end sump that was filled with water. Ms. Harding asked that this sump be pumped out and that the water be added to wastes. Along the east wall of the wash bay was a product storage area. A yellow 55-gallon tote containing punctured aerosol cans awaiting recycling was in this area as well (Photo 10). Within the building are bales of pentachlorophenol solids (product), universal waste bulbs and batteries, and hazardous wastes (90-day accumulation area). There are two flammables cabinets in this room. One contains small bottles of samples while the other cabinet is empty. At the time of our visit, there were four 55-gallon drums of petroleum distillate pentachlorophenol waste in the 90-day area (Photo 12). All drums were properly labeled as hazardous F032, D001 waste, with appropriate risk labels and dates. The oldest date seen was January 7, 2015. Mr. Hillery said that their contractor, Rineco, had picked up 22 drums of waste recently, and that pickups typically occur every two – three months. Also in this building were two containers of universal waste. We found one box of universal waste lamps, dated "12-4-13", and one 5-gallon pail of universal waste batteries, dated "8-1-13" (Photos 13, 15, 16). Two dusty black 5-gallon pails of "Revere Por Crax" were found

RCRA Site ID: WAD053823019	Facility Name: McFarland Cascade/Stella-Jones	Inspection Date: January 20, 2015
Generator Status: LQG	Facility Address: 6520 188th St NE, Arlington WA 98223	Date Report Sent: March 11, 2015

in the corner of this room (Photo 14). Mr. Hillery stated that these were product.

We then walked over to the laboratory, accompanied by Mr. Hillery. No employees were present (lunch time). Mr. Hillery showed us the two x-ray machines used to measure wood penetration (concentration of preservative in wood plugs removed from treated poles). Wooden cores and rags are placed in a red step-can that is emptied daily (Photo 17.) This can is not labeled with hazardous waste or risk labels.

We then walked to the welding and maintenance shops. Mr. Hillery said that heavy equipment is maintained in these shops. Waste oil, filters and hydraulic fluids are collected in drums in the "oil shed." No hazardous wastes are accumulated in the shop areas, though the welding shop did have a closed metal container of used aerosol cans that are taken to the oil shed for puncturing. This container was properly labeled.

The oil shed is located west of the maintenance shop. Outside of this shed are drums used for collection of drained oil filters and used hydraulic fluid. These drums were properly labeled though the "used hydraulic fluid" label was falling off at the time of our visit. If this hydraulic fluid is being managed as used oil, the correct label for this drum would be "Used Oil." An open oil pan containing used oil was sitting on top of one of the drums (Photos 18, 19, 20, 23). On the north side of the oil shed is an aerosol can crusher, within a yellow plastic housing, and equipped with a 55-gallon collection drum. This drum was properly labeled though nearly full. Adjacent to the can crusher were two containers, one red open container holding empty, punctured cans, and one yellow 55-gallon tote containing cans awaiting puncturing. Ms. Harding mentioned that the volume of hazardous waste in this area exceeded the 55-gallon limit for satellite accumulation (Photos 21 & 22.)

We concluded our site walk-through at 1:30 p.m. We then returned to the office building conference room to review documents.

Document Review

We reviewed uniform hazardous waste manifests from 2014, and one from January, 2015. No violations were noted on these documents.

We looked at and received a copy of the Daily Incidental Drip Inspection Log. Ms. Collins requested that this sheet be modified to include time of inspections and a description of cleaning performed. Ms. Harding reviewed the weekly inspection log sheets. There were three years' worth of log sheets in the book that was provided for review. Ms. Harding noted that inspections were not always being conducted within a seven-day period.

We reviewed the Drip Pad Certification reports for Cylinders 2 and 3 (retorts). These reports were prepared by Phoenix Environmental Engineers. The reports noted that the pads were constructed of steel, 12 feet x 165 feet, had four inch curbs, no cracks, no runoff, and were covered by roofs. The pads were inspected and reports signed by Pete A. Shack, PE WAPE #48105.

Mr. Hillery provided us with a copy of the Stella-Jones "Integrated Contingency Plan," dated July 2014. This document was copied and taken to be reviewed later.

RCRA Site ID: WAD053823019	Facility Name: McFarland Cascade/Stella-Jones	Inspection Date: January 20, 2015
Generator Status: LQG	Facility Address: 6520 188th St NE, Arlington WA 98223	Date Report Sent: March 11, 2015

We summarized areas of concern noted during our walk-through, and listed documents we wanted sent to us for review, then departed the site.

Post Inspection

On February 6, 2015 Mr. Hillery submitted the following documents in response to my email dated February 5, 2015:

- Training: Documents submitted were: (1) a training matrix showing training topics and personnel titles required to take specific training modules, (2) a sign-in sheet showing printed names, signatures, and departmental titles, and (3) a written training program that is incorporated into a document detailing hazardous waste management activities at Stella-Jones.
- A copy of the current General Inspection Log in use at Stella-Jones. Please see Concerns and Suggestions section for a discussion of this log sheet.
- Drip Pad Management Plan: This required document was recently updated on January 9, 2015. Additionally the Drip Pad Certifications for Cylinders 2 and 3 signed by Pete Shack, Professional Engineer at Phoenix Environmental are included in this document. Please see Concerns and Suggestions section, "Post Inspection," for a discussion of this plan.

During the inspection I noted batteries and fluorescent lamps over their threshold time limits and asked Mr. Hillery to ship them off as quickly as possible. On February 16, Mr. Hillery emailed a scanned copy of a manifest showing the Universal Waste had been shipped offsite on February 4, 2015.


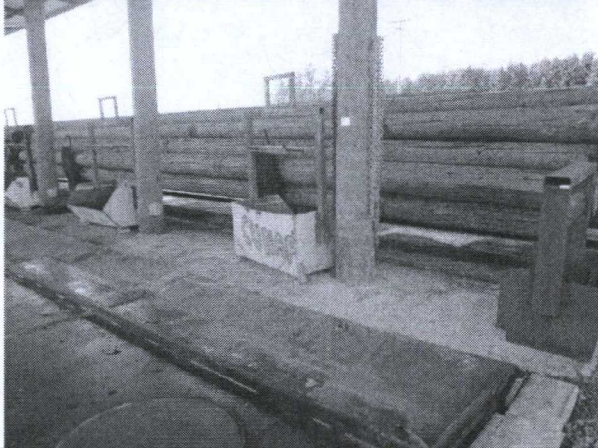
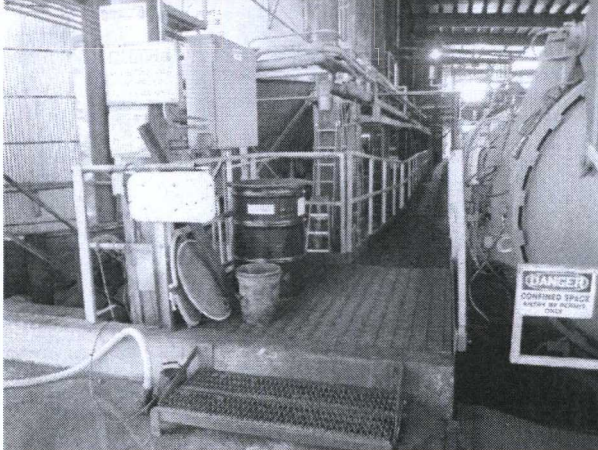
Facility: Stella Jones (aka McFarlane Cascade)
Inspection Date: January 20, 2015



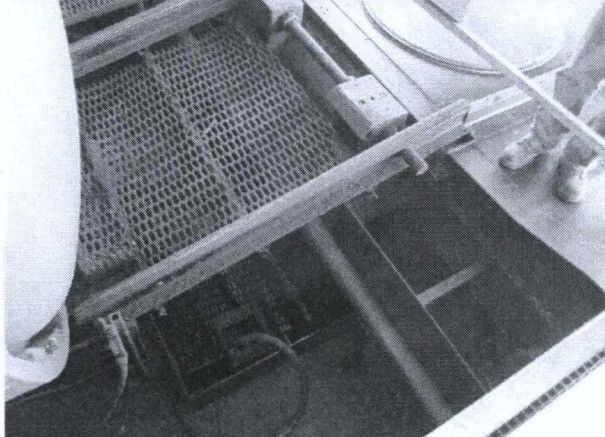
RCRA Site ID: WAD053823019
Page 1 of 9

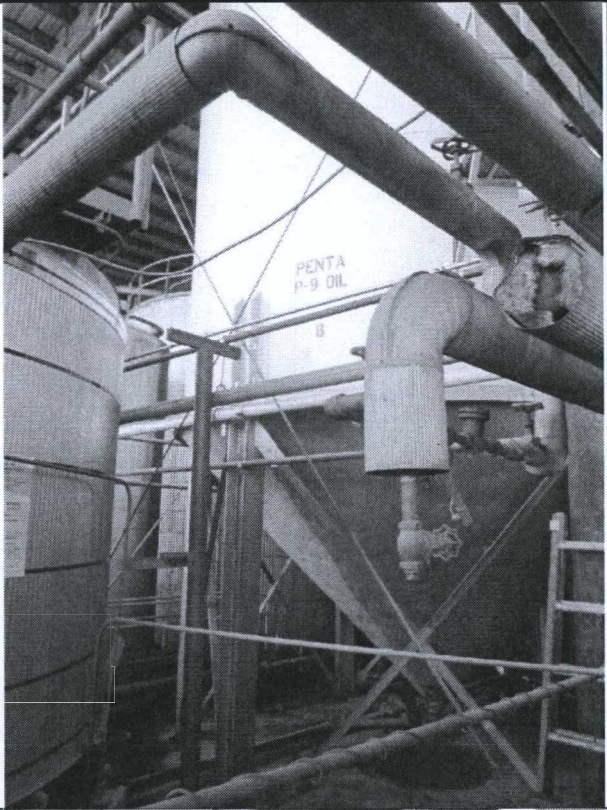
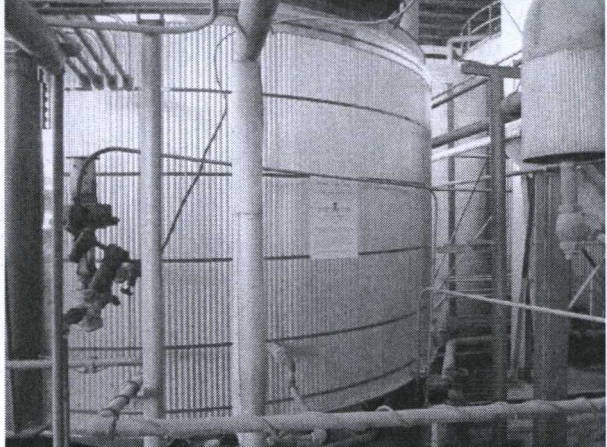
PHOTO LOG


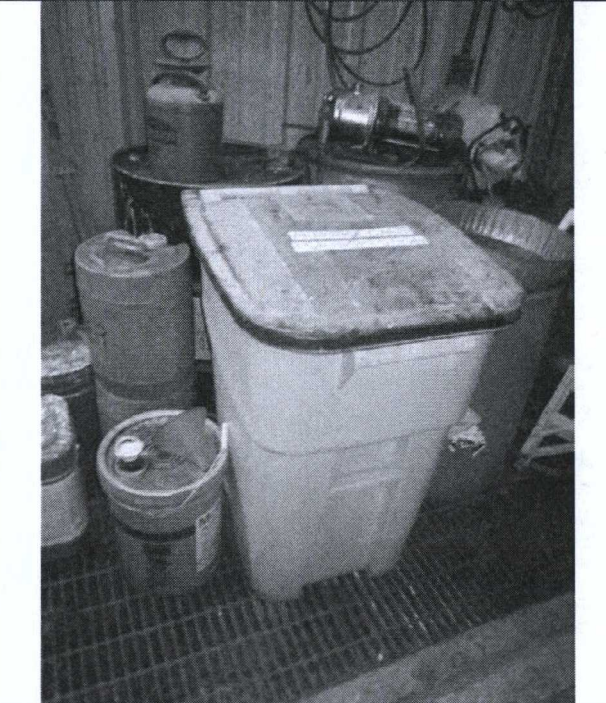
Photographer: Mindy Collins

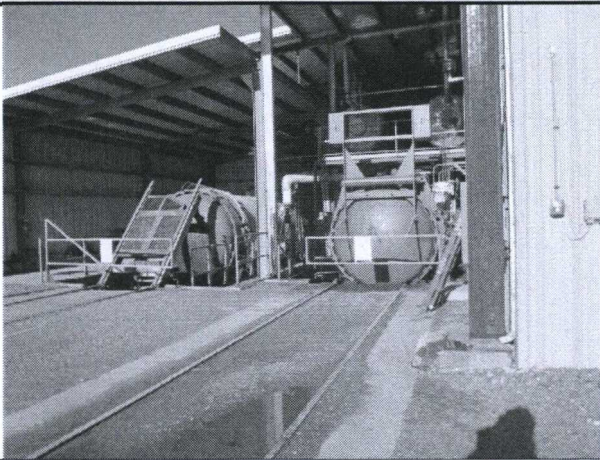


Witness: Trudy Harding

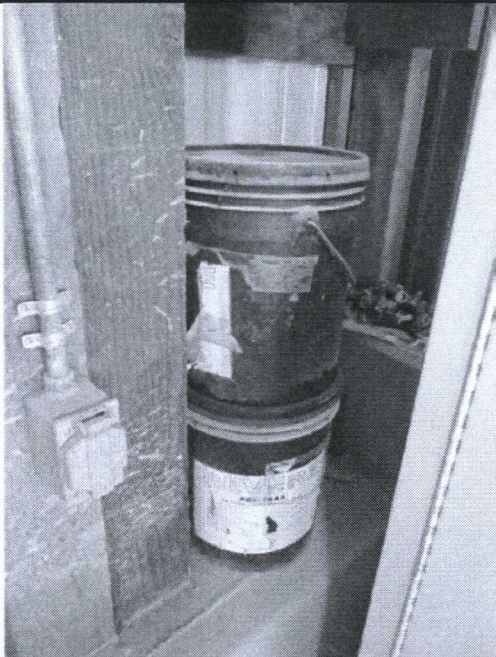
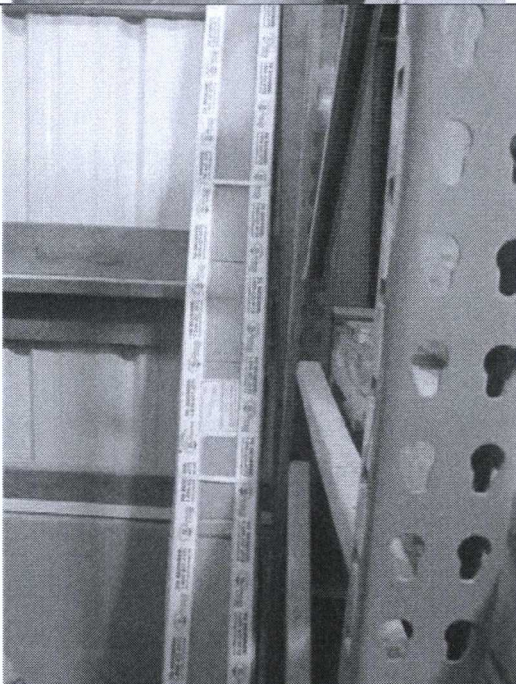
Area & Description	Photographs
<p>#1 Drip Pad Area</p> <p>Newly constructed steel drip pads (12/15/14) located at north end of retorts 2 and 3.</p>	 A black and white photograph showing a long, narrow, newly constructed steel drip pad area. The pads are made of metal and are situated under a large, open-sided structure. In the background, there are stacks of logs and some industrial equipment.
<p>#2 Drip Pad Area</p> <p>Close up of drip pad and finished charge of poles sitting on drip pad.</p>	 A black and white close-up photograph of a drip pad. A finished charge of poles is sitting on the drip pad. The poles are stacked and appear to be made of wood or a similar material. The drip pad is made of metal and is situated under a large, open-sided structure.
<p>#3 Retort Area</p> <p>North end of retort. Picture shows satellite 55-gallon drum containing F001, D001 waste solids and empty blue pail adjacent to drum.</p>	 A black and white photograph of the north end of the retort area. A satellite 55-gallon drum containing F001, D001 waste solids is visible, along with an empty blue pail adjacent to it. The area is industrial and appears to be part of a waste management facility.

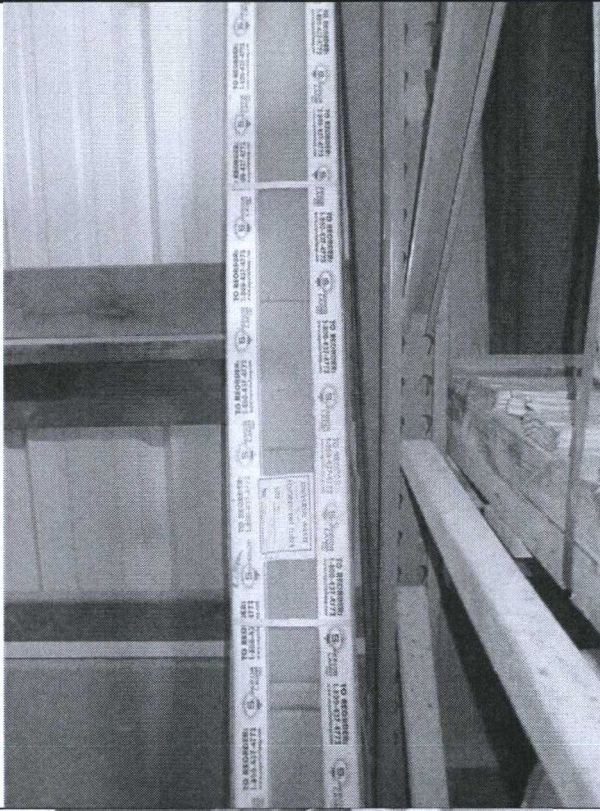
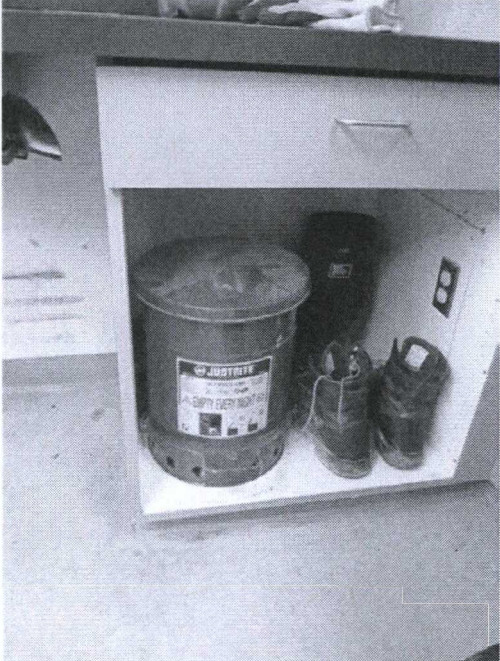
Area & Description	Photographs
<p>#4 Retort Area</p> <p>Close-up of satellite 55-gallon drum located near retort.</p>	 A black and white photograph showing a close-up of a 55-gallon drum. The drum has several labels: a rectangular 'HAZARDOUS WASTE' label, a diamond-shaped 'FLAMMABLE LIQUID' label with a flame icon, and a diamond-shaped 'TOXIC' label with a skull and crossbones icon. The number '3' is visible on the labels.
<p>#5 Retort Area</p> <p>Close-up of satellite 55-gallon drum near retort, with all labels captured in photo.</p>	 A black and white photograph showing a close-up of a 55-gallon drum. The drum has several labels: a rectangular 'HAZARDOUS WASTE' label, a diamond-shaped 'FLAMMABLE LIQUID' label with a flame icon, a diamond-shaped 'TOXIC' label with a skull and crossbones icon, and a diamond-shaped 'CORROSIVE' label with a liquid dripping icon. The number '3' is visible on the labels.
<p>#6 Retort Area</p> <p>Photo depicts drip pan located under north end of retort. This pan collects all drips of oily water. This water is re-used in the process. Both retort set-ups are identical.</p>	 A black and white photograph showing a drip pan located under a retort. The pan is a rectangular metal mesh tray. It is positioned to collect drips of oily water. The retort is visible in the background.


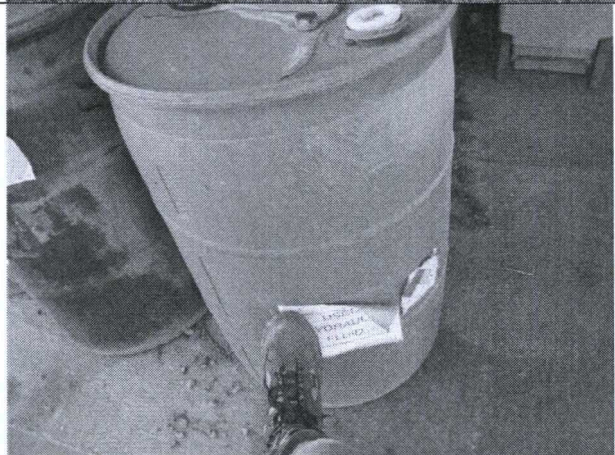
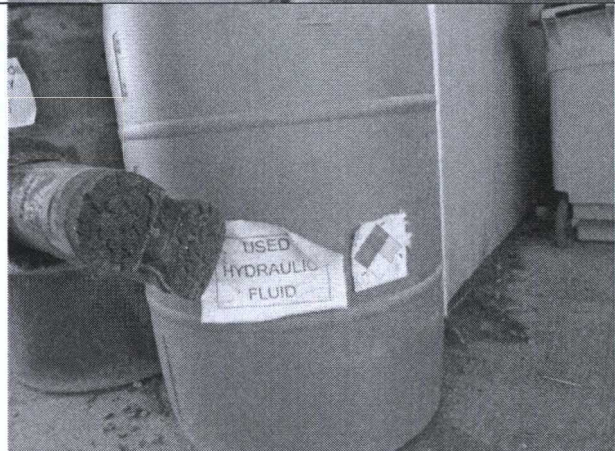
Area & Description	Photographs
<p data-bbox="126 314 321 346">#7 Retort Area</p> <p data-bbox="126 385 695 453">This photo shows one of several tanks holding pentachlorophenol oil product.</p>	 A black and white photograph showing industrial equipment. Large pipes and a tank are visible. The tank has the text "PENTA P-9 OIL" written on it. There are also some structural elements and a ladder visible.
<p data-bbox="126 1129 321 1161">#8 Retort Area</p> <p data-bbox="126 1200 711 1232">Tank containing pentachlorophenol oil product.</p>	 A black and white photograph of a large industrial tank. The tank is cylindrical and has some text on it. It is surrounded by scaffolding and other industrial structures.




Area & Description	Photographs
<p>#9 Retort Area</p> <p>Oil-water separators for process water recycling and re-use.</p>	
<p>#10 Product Storage Area in "Wash Room"</p> <p>The yellow tote in this picture contains used aerosol cans that are punctured near the used oil shed, and then transferred to this tote for off-site recycling.</p>	

Area & Description	Photographs
<p>#11 Retort Area</p> <p>Southern end of retort area where charges are loaded into the blue tubes.</p>	
<p>#12 Waste Accumulation Area</p> <p>During the time of this inspection, the accumulation area held these four drums of the petroleum distillate oil with pentachlorophenol. Twenty-two drums of this waste had been shipped in the prior week.</p>	
<p>#13 Waste Accumulation Area</p> <p>This drum of universal waste batteries shows a date (8-1-13) over the one year time limit for holding on site.</p>	

Area & Description	Photographs
<p>#14 Waste Accumulation Area</p> <p>These two 5-gallon buckets contained Revere Por Crax (SE corner of the waste accumulation room) an asphaltic sealer. It was stored here to prevent it from mistakenly being used in another application.</p>	 A black and white photograph showing two stacked 5-gallon white plastic buckets. The top bucket has a dark, possibly black, label with some text and a logo. The buckets are sitting on a concrete floor next to a wooden wall. A white electrical outlet is visible on the wall to the left of the buckets.
<p>#15 Waste Accumulation Area</p> <p>A start date of 12/4/2013 was written on this box of Universal Waste lamps indicating the box is over the one year time limit.</p>	 A black and white photograph showing a metal shelving unit. On one of the shelves, there is a box of Universal Waste lamps. The box has some text on it, including a date "12/4/2013". The shelving unit is made of metal with perforated sides.

Area & Description	Photographs
<p>#16 Waste Accumulation Area</p> <p>A start date of 12/4/2013 was written on this box of Universal Waste lamps indicating the box is over the one year time limit (also shown in photo 15).</p>	
<p>#17 Quality Control Laboratory</p> <p>This red step-can contains wooden core samples and used rags. This can is carried to the satellite accumulation area and emptied daily. The step-can lacked risk labels.</p>	

Area & Description	Photographs
<p>#18 Oil Area</p> <p>The first three drums from the left contain drained oil filters and the blue drum on the far right contains spent hydraulic fluids.</p> <p>Note the oil pan on top of the first drum from the left. It was found to contain used oil but is open and unlabeled. See photo #23 for a better view of the pan. Used oil is collected in a tank within the building.</p>	 A black and white photograph showing four large drums lined up against a wooden wall. From left to right: a dark drum with a label, a light-colored drum, a dark drum with a label, and a light-colored drum. A small oil pan sits on top of the first dark drum.
<p>#19 Oil Area</p> <p>The label needed to be turned a bit to see the label identifying the contents as used hydraulic fluid. The drum lacked a used oil label.</p>	 A black and white photograph showing a close-up of a light-colored drum. A person's foot is visible at the bottom, pointing towards the drum. A label is affixed to the drum, and the text "USED HYDRAULIC FLUID" is visible.
<p>#20 Oil Area</p> <p>It is suggested that a newer label be affixed to the drum and if possible move inside to help prevent peeling, illegible labels.</p>	 A black and white photograph showing a close-up of a light-colored drum. A label is affixed to the drum, and the text "USED HYDRAULIC FLUID" is visible. A person's foot is visible at the bottom, pointing towards the drum.

Area & Description	Photographs
<p>#21 Aerosol Can Puncturing Area</p> <p>The unit is located on the north side of the oil area.</p>	 A black and white photograph showing a small, enclosed area. On the left, there is a white cylindrical container. In the center, a red aerosol can is visible. To the right, a yellow satellite accumulation plastic can is present. The floor is dark and appears to be covered in some material. The walls are light-colored and have some markings.
<p>#22 Aerosol Can Puncturing Area</p> <p>The yellow satellite accumulation plastic can holds the cans that are to be punctured and the red can holds the metal carcasses. Satellite accumulation was exceeded by a combination of liquid hazardous waste in the 55-gallon drum under the can crusher plus aerosol cans awaiting crushing.</p>	 A black and white photograph showing a yellow satellite accumulation plastic can in the foreground. Behind it, a red can is visible. To the right, there is a white container with a pump handle. The background shows a wall with some equipment.
<p>#23 Oil Area</p> <p>Open, unlabeled container of used oil found on top of one drained oil filter drum.</p>	 A black and white photograph showing a large, dark drum in the foreground. On top of the drum, there is a white, open container. In the background, there are other drums and a wall.